

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

DONNA M. BECK

Plaintiff,

v.

MAXIMUS, INC.,

Defendant.

C.A. No. 04-2199

CLASS ACTION

FILED
SEP 14 2004
MICHAEL E. KUNZ, Clerk
Dep. Clerk

**STIPULATION TO EXTEND TIME FOR PLAINTIFF TO FILE
REPLY TO DEFENDANT'S OPPOSITION TO CLASS CERTIFICATION**

Plaintiff and defendant, by counsel, hereby agree and stipulate as follows:

WHEREAS, plaintiff has filed a Motion for Class Certification and defendant has filed an answer in opposition to such motion;

WHEREAS, plaintiff timely noticed the deposition of defendant pursuant to Rule 30(b)(6) and the deposition of Christopher Woods, an employee of the defendant; and defendant timely noticed the deposition of Plaintiff Donna M. Beck;

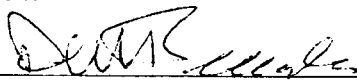
WHEREAS, despite their good faith efforts, certain logistical issues, including the schedule of plaintiff and the pending state court trial of defendant's counsel for which defendant's counsel has been attached, have prevented the depositions from being commenced to date;

WHEREAS, the parties agree that the parties may complete such depositions prior to the date plaintiff must file her reply to defendant's class certification opposition;

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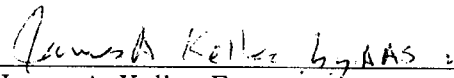
IT IS THEREFORE STIPULATED AND AGREED AS FOLLOWS:

1. Defendants shall produce for depositions the noticed witnesses no later than October 22, 2004.
2. Plaintiff shall produce Plaintiff Donna M. Beck for deposition no later than October 22, 2004.
3. Plaintiff may file her reply to defendant's opposition to class certification no later than fourteen (14) days following the completion of the said depositions.
4. The Court's Order of July 1, 2004 shall be amended to reflect that a Rule 16 conference will be held, should the Court's schedule so permit, during the week of November 15, 2004.


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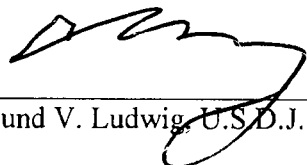
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Attorney for Defendant

APPROVED AND SO ORDERED:


Edmund V. Ludwig, U.S.D.J.

Date: 09/14/04

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215-732-8060

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